

**MONTGOMERY, McCracken, Walker & Roads, LLP**  
ATTORNEYS AT LAW

**GREGORY M. HARVEY**  
ADMITTED IN PENNSYLVANIA

DIRECT DIAL  
215-772-7684

gharvey@mmwr.com

123 SOUTH BROAD STREET  
AVENUE OF THE ARTS  
PHILADELPHIA, PA 19109  
215-772-1500  
FAX 215-772-7620

LIBERTYVIEW  
457 HADDONFIELD ROAD, SUITE 600  
CHERRY HILL, NJ 08002  
856-488-7700  
FAX 856-488-7720

300 DELAWARE AVENUE, SUITE 750  
WILMINGTON, DE 19801  
302-504-7800  
FAX 302-504-7820

1235 WESTLAKES DRIVE, SUITE 200  
BERWYN, PA 19312  
610-889-2210  
FAX 610-889-2220

September 2, 2005

**By Federal Express**

Federal Election Commission  
General Counsel's Office  
999 E Street, N.W.  
Washington D.C. 20463

**Attention:** Ms. Kim Collins

**Re: In re The Scranton Times, L.P. (*The Times-Tribune*)—Complaint of  
Republican State Committee of Pennsylvania--MUR 5679**

Greetings:

Submitted with this cover letter are three Designation of Counsel forms, each executed by George V. Lynett, on behalf of the three respondents (the "newspaper respondents") that the complainant in MUR 5679 asserted were responsible for the promotional advertising campaign for *The Times-Tribune* newspaper that is the subject of the complaint.

We are advised that one of the three letters dated August 26, 2005 from Supervisory Attorney Jeff S. Jordan addressed to the newspaper respondents was received by George V. Lynett on the next weekday, August 29<sup>th</sup>, and that the other two letters were received on August 30<sup>th</sup>. Counting from August 29<sup>th</sup> the fifteen days for a response, we note that the response of the newspaper respondents would be due on Tuesday, September 13, 2005, and we intend to submit that response by Federal Express, priority overnight delivery, leaving Philadelphia on Monday, September 12, 2005. We will assume that this proposed timing of the response on behalf of the newspaper respondents is satisfactory to the General Counsel's Office unless we are advised to the contrary.

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

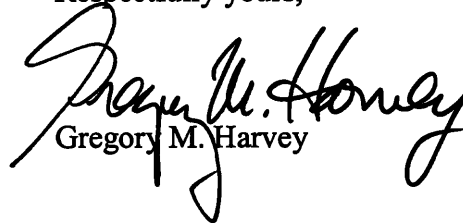
2005 SEP -6 P 12:30

26044150676

Federal Election Commission  
September 2, 2005  
Page 2

Our response will include facts to demonstrate that the only appropriate respondent is The Scranton Times, L.P., a Pennsylvania limited partnership, that owns and publishes *The Times-Tribune*, and that neither Scranton Times, Inc., nor Towanda Printing Company had any connection with the promotional advertising campaign that is the subject matter of the complaint (although all three entities are related through ownership interests of the Lynett family).

Respectfully yours,

  
Gregory M. Harvey

Enclosures

cc (w/enclosures): Joseph J. O'Brien, Esquire  
Haggerty, McDonnell & O'Brien

26044150677



**FEDERAL ELECTION COMMISSION**  
**Office of General Counsel**  
999 E Street, NW  
Washington, DC 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
2005 SEP -6 P 12:30

**STATEMENT OF DESIGNATION OF COUNSEL**  
Please use one form for each Respondent/Witness  
FAX (202) 219-3923

MUR: 5679

COUNSEL: Gregory M. Harvey

FIRM: MONTGOMERY, McCRACKEN, WALKER & RHOADS, LLP

ADDRESS: 123 South Broad Street, Philadelphia, PA 19109

TELEPHONE - OFFICE: (215) 772-7684

FAX: (215) 772-7620

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

9/11/05 Gregory M. Harvey Publisher  
Date Signature Title

RESPONDENT/WITNESS NAME (PRINT): The Scranton Times, L.P., a Pennsylvania limited partnership, owner and publisher of The Times-Tribune

MAILING ADDRESS: newspaper  
149 Penn Avenue

Scranton, PA 18503

TELEPHONE - HOME: ( )

OFFICE: (507 ) 348-9107

Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation



**FEDERAL ELECTION COMMISSION**  
**Office of General Counsel**  
999 E Street, NW  
Washington, DC 20463

**STATEMENT OF DESIGNATION OF COUNSEL**  
Please use one form for each Respondent/Witness  
FAX (202) 219-3923

MUR: 5679

COUNSEL: Gregory M. Harvey

FIRM: MONTGOMERY, McCRACKEN, WALKER & RHOADS, LLP

ADDRESS: 123 South Broad Street, Philadelphia, PA 19109

TELEPHONE - OFFICE: (215) 772-7684

FAX: (215) 772-7620

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

9/1/05      Gregory M. Harvey      President  
Date                      Signature                      Title

RESPONDENT/WITNESS NAME (PRINT): The Scranton Times, Inc.

MAILING ADDRESS: 149 Penn Avenue

Scranton, PA 18503

TELEPHONE - HOME: ( )

OFFICE: (507) 348-9107

Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

2005 SEP - 6 PM 12:30

26044150679



**FEDERAL ELECTION COMMISSION**

**Office of General Counsel**

**999 E Street, NW**

**Washington, DC 20463**

**STATEMENT OF DESIGNATION OF COUNSEL**

Please use one form for each Respondent/Witness

FAX (202) 219-3923

MUR: 5679

COUNSEL: Gregory M. Harvey

FIRM: MONTGOMERY, McCracken, Walker & Rhoads, LLP

ADDRESS: 123 South Broad Street, Philadelphia, PA 19109

TELEPHONE - OFFICE: (215) 772-7684

FAX: (215) 772-7620

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

9/11/05  
Date

Gregory M. Harvey  
Signature

President  
Title

RESPONDENT/WITNESS NAME (PRINT): Towanda Printing Company

MAILING ADDRESS: 149 Penn Avenue

Scranton, PA 18503

TELEPHONE - HOME: ( )

OFFICE: (507) 348-9107

Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

2005 SEP -6 P 12:30

26044150680